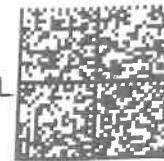


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0003 *Office of the General Counsel*
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Las Vegas, Nevada 89146-3406

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March 24, 2022

U.S. MAIL

David C. O'Mara
The O'Mara Law Firm, P.C.
311 East Liberty Street
Reno, Nevada 89501

Joan M. Mannix
Thomas More Society
309 West Washington Street, Suite 1250
Chicago, Illinois 60606

**Re: East Career and Technical Academy
 Felipe Avila/Students for Life Club
 First Amendment and Cyberbullying Concerns**

Counsel:

Following is the substantive response to your letter dated February 16, 2022.

Assistant Principal Vincent Medina

Mr. Medina no longer works for the Clark County School District, so I was unable to interview him to obtain any information about Mr. Avila's allegations that Mr. Medina treated Mr. Avila and/or SFLC differently than he treated other students and/or student organizations.

Chalking

During the 2019-2020 school year, members of the Senior Class at ECTA were permitted to use chalk on a single occasion to write their names, social media information, and brief messages related to graduation on certain sidewalks and common outdoor areas. The opportunity was not made available to any other students or grade levels, nor was it made available to any student clubs. Since that time, no members of the school community have been permitted to chalk on any areas of the ECTA campus, and Ms. Taylor has prohibited chalking by all students and student organizations for any purpose.

David O'Mara
Joan Mannix
March 24, 2022
Page 2 of 3

Flyers

ECTA student organizations are currently permitted to post flyers announcing the date, time, and location of meetings, and identifying who is invited to attend. The DECA club flyer referenced in your letter was used to inform ECTA students about a fundraiser that DECA was conducting to benefit The Shade Tree, a Las Vegas community organization that supports women and children in times of crisis. The flyer was not an advertisement or promotion for The Shade Tree, nor was it an advertisement or promotion for a fundraiser organized by or conducted at The Shade Tree. As of today, SFLC has not submitted any requests to post or distribute any flyers to inform ECTA students about any fundraisers for any community organizations.

In addition, student organizations at ECTA are permitted to post one approved flyer per meeting or event, containing the time, place, and location of their meetings, and identifying who is invited to attend.

East Tech Times Newsletter

SFLC has never requested that it be permitted to include any announcements or other information in the East Tech Times. If it does, it will be treated the same as other student organizations that place announcements or other information in the school newsletter.

February 2022 Meeting/Summit

Only members of Clark County School District- and ECTA-sponsored organizations (such as Student Council) were invited to the meeting that occurred on February 7, 2022. The meeting was not open to any student-sponsored organizations at ECTA, nor was it intended to be exclusionary; it was primarily conducted to address some immediate concerns that were surfacing at the school following a teacher's resignation.

As a result of that meeting, ECTA administrators began working to create the Titan Council, an interclub counsel that will meet monthly to discuss student issues and concerns and share ideas, events, and plans for the upcoming school year. Representatives from all Clark County School District- and ECTA-sponsored organizations and all other student organizations – including SFLC – will be invited to attend. The first meeting is scheduled to occur later this month.

Banner

Ms. Taylor is unaware of any requests by SFLC to hang any banners in the catwalk area of ECTA, and individual students are prohibited from hanging banners anywhere on the ECTA campus. When a student hung a banner during Native American Month, school administrators promptly removed it. In addition, pursuant to the ECTA Student Handbook, student organizations are prohibited from hanging any banners in the school cafeteria unless they benefit all students.

David O'Mara
Joan Mannix
March 24, 2022
Page 3 of 3

Bulletin Board

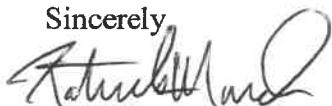
ECTA administrators have designated a bulletin board for each student organization at ECTA, including SFLC. A copy of the bulleting board assignment list is enclosed. To Ms. Taylor's knowledge, with the exception of posting a few materials at the beginning of the school year, SFLC has not utilized its bulletin board during the current school year.

Bullying Allegations

Again, pursuant to the Family Educational Rights and Privacy Act (20 U.S.C. §1232g; 34 CFR Part 99) (FERPA), the Clark County School District cannot address or discuss any of the cyberbullying allegations with you unless Mr. Avila provides written consent that complies with FERPA. And in any event, CCSD cannot address or discuss any other students with you and/or Mr. Avila.

I believe that the foregoing addresses all of the concerns raised in your letters dated February 7 and February 17, 2022. Please let me know if you need any additional information.

Sincerely,



Patrick J. Murch
Assistant General Counsel
murchpj@nv.ccsd.net

Enclosure

cc: Trish Taylor (via email)